

**POST & SCHELL, P.C.**

BY: DAVID E. FAUST

I.D. #:

1800 JOHN F. KENNEDY BLVD.

PHILADELPHIA, PA 19103-7480

215-587-1000

ATTORNEYS FOR DEFENDANT  
NATIONAL RAILROAD PASSENGER  
CORPORATION t/a AMTRAK

DEBORAH ORRINO

Plaintiff,

v.

NATIONAL RAILROAD PASSENGER  
CORPORATION t/a AMTRAK

Defendant.

UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF  
PENNSYLVANIA

NO: 02-CV-4064

**NOTICE OF REMOVAL**

TO THE JUDGES OF THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA:

Defendant, National Railroad Passenger Corporation t/a Amtrak, respectfully asserts the following:

1. On June 19, 2002, defendant, National Railroad Passenger Corporation t/a Amtrak, received the Complaint in this civil action which is currently pending in the Court of Common Pleas of Philadelphia County, Pennsylvania. A copy of the Complaint is attached hereto as Exhibit A. The Complaint constitutes the prior pleadings in this matter in the Court of Common Pleas of Philadelphia County, Pennsylvania to date.

2 Because defendant, National Railroad Passenger Corporation, was created by an Act of Congress, 45 U.S.C., §501 et seq., the above described action is a civil action of which this Court has original jurisdiction under the provisions of Title 28, U.S.C., §1331, and is one which may be

removed to this Court by the defendant, National Railroad Passenger Corporation herein, pursuant to the provisions of Title 28, U.S.C., §1441.

WHEREFORE, defendant, National Railroad Passenger Corporation t/a Amtrak, prays that the action now pending against it in the Court of Common Pleas of Philadelphia County, Pennsylvania, be removed therefrom to this Court.

POST & SCHELL, P.C.

BY:  
DAVID E. FAUST, ESQUIRE  
Attorney for Defendant, National  
Railroad Passenger Corporation  
t/a Amtrak

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DEBORAH ORRINO

Plaintiff,

v.

NATIONAL RAILROAD PASSENGER  
CORPORATION t/a AMTRAK

Defendant.

COURT OF COMMON PLEAS  
PHILADELPHIA COUNTY

JUNE TERM, 2002

NO: 1756

**NOTICE OF REMOVAL**

TO THE PROTHONOTARY:

PLEASE TAKE NOTICE that the above captioned action has been removed from your court to the United States Court for the Eastern District of Pennsylvania where it has been assigned Civil Action No. per the attached certified Notice of Removal.

POST & SCHELL, P.C.

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DAVID E. FAUST, ESQUIRE  
Attorney for Defendant, National  
Railroad Passenger Corporation  
t/a Amtrak

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the within Notice for Removal has been served on all interested counsel listed below via first class mail, postage pre-paid, on June 25, 2002.

Stephen David, Esquire  
Groen, Lamm, Goldberg & Rubenstone  
Four Greenwood Square, Suite 200  
Bensalem, PA 19020

POST & SCHELL, P.C.

BY:  
DAVID E. FAUST, ESQUIRE  
Attorney for Defendant, National Railroad  
Passenger Service Corporation